

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE :  
PLAYERS' CONCUSSION INJURY : No. 2:12-md-02323-AB  
LITIGATION :  
: MDL No. 2323

---

THIS DOCUMENT RELATES TO: :  
ALL ACTIONS :  
: :  
: :

## REPORT OF THE SPECIAL MASTERS

1. Wendell E. Pritchett and Jo-Ann M. Verrier, as Special Masters appointed by the Court on July 13, 2016 (ECF 6871), and David Hoffman, appointed by the Court on March 5, 2020 (ECF 11022) pursuant to Article X of the Class Action Settlement Agreement (Settlement Agreement) submit this Report to the Court. It accompanies Status Reports from the Claims Administrator, Brown Greer LLC (“Claims Administrator”), and the Baseline Assessment Program Administrator, Epiq Mass Tort (“BAP Administrator”; formerly known as Garretson Resolution Group).  
  
2. The Special Masters note that our pattern has been to post reports on a quarterly basis. However, we file this Report a month later than typical to focus specifically on the effectuation of the Court’s order of March 4, 2022 (see next section).  
  
3. The work of the Settlement Agreement and our Administrators on matters beyond the March 4 Order has continued apace. This broader work is well-described by the 1<sup>st</sup> Quarter 2022 Status Reports submitted by both Administrators, which accurately and thoroughly reflect the work of both firms throughout this extended period.

**Norming Agreement**

4. On March 4, 2022, pursuant to Section 6.6 of the Settlement Agreement, the Court granted a motion accepting an agreement (the “Norming Agreement”) between the NFL Parties, Class Counsel, and certain Intervenors to remove race norms and demographic estimates based on race from the NFL Concussion Settlement Program.
5. That agreement was built under the supervision of Magistrate Judge David Strawbridge with the collaboration of Special Master Hoffman, after the Court ordered the Parties and the Intervenors to address concerns raised in *Henry et al. v. Nat'l Football League et al.*, 2:20-cv-04165 (E.D. Pa. Aug. 25, 2020).
6. The Norming Agreement, as approved by the Court, authorized the rescoring of specific previously submitted claims, the granting of additional BAP exams to some Players, as well as other relief including the reorganization of administration of the Settlement Agreement to comply with the March 4 Order.
7. The Administrators, with the support of the Special Masters and the input of the Parties, have efficiently addressed this work. Prior to April 30, 2022, the Claims Administrator, working with information provided by the BAP Administrator, reviewed relevant information about individual Settlement Class Members to effectuate the Court’s Order..
8. The Claims Administrator’s report outlines the results of the rescoring effort and of the authorization of new BAP exams.
9. Additionally, the administrative processes in place for new claims have been developed to ensure that all are fully compliant with the March 4 order of the Court. Many of these clarifications are addressed in the Frequently Asked Questions section of the NFL

Concussion Settlement website (see

<https://www.nflconcussionsettlement.com/FAQDetails.aspx?q=534#534>).

10. As noted on the website, any questions regarding the Norming Agreement and individual claims can be directed to the Claims Administrator.

### **General Administration**

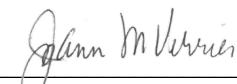
11. As noted above, the BAP Program, claims processing, audit processes, and appeals continued throughout the first quarter. Progress on all of these, and other critical Settlement issues, are accurately recounted in the accompanying reports by the BAP Administrator and the Claims Administrator.
12. Finally, we note that monthly disbursements have been made during this period. Each month, after review with the Claims Administrator, the Special Masters authorize the Trustee to distribute Monetary Awards to Settlement Class Members as well as to relevant attorneys, lienholders, and third-party funders where appropriate. The funds distributed to date are accounted for in the Claims Administrator's report.

Respectfully submitted,



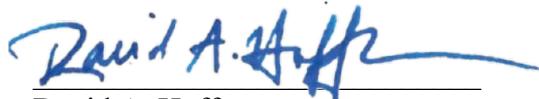
---

Wendell E. Pritchett  
Special Master



---

Jo-Ann M. Verrier  
Special Master



David A. Hoffman  
Special Master